

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., *et al.*,**

**Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

**SECOND SUPPLEMENTAL DECLARATION OF THOMAS O. POWELL IN SUPPORT  
OF APPLICATION OF DEBTORS FOR AUTHORITY TO RETAIN AND EMPLOY  
CORNERSTONE RESEARCH AS CONSULTANTS TO THE DEBTORS *NUNC PRO  
TUNC TO JANUARY 14, 2020***

I, Thomas O. Powell, hereby declare that the following statements are true  
and correct to the best of my knowledge after due inquiry as described herein:

1. I am the Associate General Counsel of the consulting firm of Cornerstone Research, Inc. (“**Cornerstone**”), which maintains offices at 699 Boylston Street, Boston, MA, 02116. I am an attorney admitted to practice law in the State of California. Except as otherwise noted, I have personal knowledge of the matters set forth herein, and if called and sworn as a witness, I could and would testify competently thereto.

2. On September 15, 2019 (the “**Petition Date**”), each of the above captioned debtors (collectively, the “**Debtors**”) commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”). On May 13,

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901

2020, the Debtors filed an application for authority to retain and employ Cornerstone as consultants to the Debtors [D.I. 1150] (the “**Application**”)<sup>2</sup> pursuant to sections 327(a) of the Bankruptcy Code, rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and rules 2014-1 and 2016-1 of the Local Bankruptcy Rules for the Southern District of New York.

3. My declaration in support of the Application (the “**Original Declaration**”) was attached to the Application as Exhibit C. On June 11, 2020, the Court entered the *Order Authorizing the Retention and Employment of Cornerstone Research as Consultants for the Debtors Nunc Pro Tunc to January 14, 2020* [D.I. 1255] (the “**Retention Order**”).

4. On August 24, 2020, I submitted a supplemental declaration (the “**Supplemental Declaration**”) to provide additional disclosures in accordance with rules 2014(a) and 2016(b) of the Bankruptcy Rules and as required under the Retention Order. The Supplemental Declaration disclosed increases in the billing rates, effective September 1, 2020, of Cornerstone professionals who had provided services on the engagement as of the date of the Supplemental Declaration. The Supplemental Declaration provided notice of the increases to Cornerstone’s billing rates in accordance with the Retention Order.

5. In connection with the Application and Retention Order, I now submit this second supplemental declaration [D.I. 1603] (the “**Second Supplemental Declaration**”) to provide additional disclosures in accordance with rules 2014(a) and 2016(b) of the Bankruptcy Rules and as required under the Retention Order.

6. In the Original Declaration, I disclosed the hourly billing rates in effect for Cornerstone professionals expected to spend significant time on the engagement. I also

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

disclosed that Cornerstone's hourly rates are subject to change from time to time in the regular course of Cornerstone's business. Pursuant to the Retention Order, Cornerstone must provide notice of increases to its billing rates before implementing those changes. In the August 24, 2020 Supplemental Declaration, I disclosed and thereby provided notice of increases to Cornerstone's billing rates effective September 1, 2020.

7. This Second Supplemental Declaration discloses and provides notice of increases in the billing rates, effective January 1, 2021, of Cornerstone professionals who have provided services on the engagement to date and whose billing as set forth below:

<b>Name</b>	<b>Title</b>	<b>2021 Rate</b>
Sally Woodhouse	Senior Vice President	875
Abe Chernin	Vice President	855
Penka Kovacheva	Principal	740
Rezwan Haque	Senior Manager	665
Jamie Lee	Senior Manager	665
Sarah Abraham	Manager	625
Fang Guo	Manager	625
Lucia Yanguas	Associate	560
Anton Popov	Associate	510
Nolan Russell	Research Associate	465
Kyla King	Research Associate	420
Maaiké Desmedt	Senior Analyst	390
Jeffrey McGill	Senior Analyst	390
Yixin Chen	Analyst	355
Benjamin Delsman	Analyst	355
Ruihan Guo	Analyst	355
Christopher Li	Analyst	355
Robert Miller	Analyst	355
Qian Wang	Analyst	355
Eric Bazak	Analyst	330
Yuehan Lan	Analyst	330
Gehna Nandwani	Analyst	330
Regena Rosati	Information Resources Manager	410
Sarah Chiappetta	Senior Information Specialist	395
Heather Gamberg	Senior Information Specialist	395
Claudia Yen	Litigation Support Specialist	160

8. Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

Executed on this 15th day of December, 2020.

A handwritten signature in black ink, appearing to read 'T. O. Powell', is written over a horizontal line.

Thomas O. Powell  
Associate General Counsel  
Cornerstone Research, Inc.